

Before the
Federal Communications Commission
Washington D.C. 20554

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FCC MAIL ROOM

In the Matter of)
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Amendment of Part 95 of the)
Commission's Rules to)
Establish a Very Short Distance)
Two-Way Voice Radio Service)

WT Dockett 95-102

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Comments to a Notice of Proposed Rule Making

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On personal behalf AND that of the Wisconsin Council of REACT Teams

September 30, 1995

As users of the General Mobile Radio Service for nearly twelve years, we are concerned about the effect the proposed "Family Radio Service" would have on the GMRS users and repeater operations now in use. We feel that allowing licensed and non-licensed users to utilize the same frequencies yields the potential, not only for mutual interference, for unlicensed repeater operations, and increased manipulation of power, but will also allow operations by business in an atmosphere which can not be policed.

Currently, the GMRS rules do not allow business operation, yet business use becomes more prevalent, almost daily. These businesses fail to identify themselves with their FCC-assigned callsign, and frequently interrupt other conversations. In most cases, there is no record of a license being issued for individuals, or business in that particular area of operation. We feel that by allowing the "Family Radio Service" to be overlaid on portions of the GMRS, the Commission ignores the potential for interference to licensed users of GMRS, and fails to address the issue of licensed GMRS communications causing interference to the proposed service.

We do recognize the potential of the proposed "Family Radio Service", and agree that current technology can create the equipment for such a service at affordable cost to the consumer. We note that more jobs will be created and more choices will be available to the consumer. We are concerned about the probability of interference to repeater operations on existing GMRS channels by the inclusion of the 467 Mhz band. We have witnessed some

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September 30, 1995 NPRM page 2

While our methods are perhaps not as controlled as those of a major manufacturer of communications equipment, nor those of the FCC, they may more realistically approach actual conditions. We simply transmitted the current CTCSS sub-audible tone and the proposed 467.xxxx frequencies on either side of the repeater input frequency from a low-powered transceiver similar to that proposed by Tandy. We consistently were able to access the repeater.

Under these conditions, perhaps some revision of the technical standards are appropriate. We feel that perhaps the proposed maximum deviation of plus/minus 5 KHz is somewhat misleading, and that Tandy and the Commission actually proposed a 5 KHz 'envelope', or plus/minus 2.5 KHz. This change in the standards would lessen the potential threat of interference to the GMRS systems that currently exist.

We also feel that the transceivers should be constructed so as not to provide for external transmitter keying. This would lessen the probability of a repeater being constructed from two units by using the readily available assemblies on the market. We agree that the inter-connection with the public switched network should be prohibited. The potential for allowing cordless telephones on these frequencies does exist, and could lead to chaos in the proposed "Family Radio Service".

We also agree with the Commission proposal to include some form of selective calling as an integral part of each transceiver, but would suggest that a method of defeating the select call muting be devised to insure pre-transmission monitoring.

Fifty per cent (50%) of the members of the Wisconsin Council of REACT Teams utilize GMRS in some activity nearly daily. Personal use, projects, weather watches, community watches, accident reporting, and traffic watches are simply a small portion of the variety of uses for GMRS. The wholesale marketing operation we envision by the manufacturers, using the currently proposed transceivers has the potential to cause havoc among the GMRS network presently being employed in Wisconsin. We feel that the Commission should realize that current users should be allowed to operate without having to respond to a new proposal benefitting primarily Big Business every ten years.

We understand progress and completely agree with the idea of efficient use of the radio spectrum. We do not feel that business interests or deregulation should cause harm to existing users of a particular portion of the spectrum. We applauded the initial efforts of the Commission in the mid-80s as the GMRS was redesigned more toward the personal user and the business use was encouraged to seek other portions of the spectrum.

Our concern with the proposed FRS is the lack of regulation policy. We can envision a UHF unlicensed Citizens Band, totally out of control as we presently have on the 27 Mhz CB band, with language, power, and interference violations being the norm, rather than the exception. We do not envision that the Commission will be capable of maintaining any type of control, simply because of the lack of funds and available personnel. The temptation for business use could be overwhelming. We could envision a security team in a major department store using FRS units. A surveyor and crew could ideally use FRS. Even fast food restaurants could utilize FRS for the drive-thru.

This is not the intent of the original proposal by Tandy, nor the intent of the Commission in proposing the service. The Rules of the Commission, as modified in 1988, specifically prohibited business use in the GMRS spectrum. This proposal, by Tandy, simply opens the door for business to re-enter the GMRS spectrum, with UNLICENSED operation. Not only would the end result be interference to GMRS users, there will be significant interference to those specific groups targeted by Tandy as potential users of the service.

In summary, we realize the potential of the FRS, and do not deny that there would be a more efficient use of the radio spectrum. Our concerns include the lack of regulation, and the potential for mutual interference under the proposed technical standards. We are also concerned that the creation of the FRS not be a first step toward the delicensing of the GMRS in its entirety. We feel that some acknowledgement of the future of GMRS would be appropriate by the Commission.